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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
GREENVILLE DIVISION

9:22-425-TMC-MHC

Antonio T. Wakefield,

Plaintiff,

vs.

**NOTICE OF REMOVAL**

South Carolina Department of Corrections,

Defendant.

**TO: PLAINTIFF ANTONIO T. WAKEFIELD, PROCEEDING *PRO SE*:**

YOU WILL PLEASE TAKE NOTICE that the Defendant, South Carolina Department of Corrections, hereby removes the above-captioned case from the Circuit Court of Greenville County, South Carolina, into the United States District Court, District of South Carolina, Greenville Division. This removal is proper on the following grounds:

1. A civil action has been commenced and is now pending in the Circuit Court of Greenville County, State of South Carolina, styled as *Antonio T. Wakefield v. South Carolina Department of Corrections*, Civil Action Number 2021-CP-23-01325.

2. This Defendant is entitled to removal of the aforesaid to this Court because the Complaint raises allegations arising under the Constitution and laws of the United States as contemplated by 28 U.S.C. § 1331.

3. This action was commenced by service of the Summons and Complaint, attached hereto as Exhibit A, Greenville County Court of Common Pleas Dormant File Notice to Plaintiff, attached hereto as Exhibit B. Attached as Exhibit C is the Affidavit of Service on the Defendant

on January 11, 2022. Pursuant to 28 U.S.C. § 1446, this Notice of Removal is filed within thirty (30) days of service upon the Defendant of the initial pleadings setting forth the claim upon which relief is requested. The Defendant will file a Motion to Dismiss as a responsive pleading to Plaintiff's Complaint.

4. The Honorable Paul B. Wickensimer, Greenville County Clerk of Court, has been provided a copy of this Notice of Removal.

WHEREFORE, the Defendant gives notice that the aforesaid action is removed from the Circuit Court of Greenville County, State of South Carolina, and to this Court for trial and determination.

WILLSON JONES CARTER & BAXLEY, P.A.

*s/Charles F. Turner, Jr.*

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*Attorney for Defendant South Carolina Department  
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Greenville, SC  
February 10, 2022